

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

SOUTH CAROLINA STATE  
CONFERENCE OF THE NAACP; IBRAM  
X. KENDI; AYANNA MAYES; MARY  
WOOD; T.R., a minor by and through their  
father and next friend, TODD  
RUTHERFORD; J.S., a minor by and  
through their mother and next friend,  
AMANDA BRADLEY,

*Plaintiffs,*

v.

ELLEN WEAVER in her official capacity as  
South Carolina Superintendent of Education;  
SCHOOL DISTRICT FIVE OF  
LEXINGTON & RICHLAND COUNTIES;  
and LEXINGTON COUNTY SCHOOL  
DISTRICT THREE,

*Defendants.*

**Case No. 3:25-cv-487-SAL**

**REQUEST FOR JUDICIAL NOTICE IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR PRELIMINARY INJUNCTION**

Plaintiffs South Carolina State Conference of the NAACP, Ibram X. Kendi, Mary Wood, Ayanna Mayes, Todd Rutherford on behalf of his minor child T.R., and Amanda Bradley on behalf of her minor child J.S. (collectively "Plaintiffs"), by and through their attorney, hereby request that the Court take judicial notice, pursuant to Federal Rule of Evidence 201 and applicable case law<sup>1</sup>,

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<sup>1</sup> *Phillips v. Pitt Cnty. Mem'l Hosp.*, 572 F.3d 176, 180 (4th Cir. 2009) (holding that courts "may properly take judicial notice of matters of public record"); *Hall v. Virginia*, 385 F.3d 421, 424 & n.3 (4th Cir. 2004) (taking judicial notice of voting-age population statistics from the official redistricting website of the Virginia Division of Legislative Services); *Ehrlich v. Cent. Transp., LLC*, 2014 WL 1404701, at \*3 (N.D. W. Va. Apr. 10, 2014) (taking judicial notice of electronically available Social Security Administration standard mortality table); see *Guthrie v.*

of the April 12, 2025 Meeting Minutes of the South Carolina Education Oversight Committee (“Education Meeting Minutes”), attached hereto as Exhibit A.

The Education Meeting Minutes were made publicly available after Plaintiffs’ Motion for Preliminary Injunction was fully briefed. *See* Pls.’ Consol. Reply in Supp. Of Prelim. Inj., ECF No. 53 (“Pl. Reply”). The minutes confirm the state Education Oversight Committee’s understanding that the new standards from the social studies cyclical review process will not be implemented until 2027. Plaintiffs request that the Court take judicial notice of the Education Meeting Minutes, which support the review process timeline described in Plaintiffs’ Reply. *See* Pl. Reply, ECF No. 53, at 7-8.

The Defendants do not oppose this filing but reserve the right to file a brief Response to it.

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*McClaskey*, 2012 WL 5494457, at \*2–3 (W.D. Va. Nov. 13, 2012) (taking judicial notice of a ruling from the Virginia Department of Employment Dispute Resolution).

Dated: July 3, 2025

Respectfully submitted,

[TK]

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